ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
JUN - 8 1995
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of	)	
	)	
Amendment to the Commission's	)	IB Docket No. 95-41
Regulatory Policies Governing	)	
Domestic Fixed Satellites and	)	
Separate International Satellite	)	
Systems	)	

DOCKET FILE COPY ORIGINAL

COMMENTS OF TELECOMUNICACIONES DE MEXICO

Telecomunicaciones de Mexico
Carlos Mier y Teran Ordiales
Director General
Eje Central Lazaro Cardenas 567
Col. Narvarte, Mexico, D.F. C.P. 03020
(525) 629-11-70 (telephone)
(525) 709-96-38 (fax)

June 8, 1995

No. of Copies rec'd 0+4
List A B C D E

TABLE OF CONTENTS

RECEIVED
JUN - 8 1995
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment to the Commission's	)	IB Docket No. 95-41
Regulatory Policies Governing	)	
Domestic Fixed Satellites and	)	
Separate International Satellite	)	
Systems	)	

COMMENTS OF TELECOMUNICACIONES DE MEXICO

Telecomunicaciones de Mexico ("Telecomm"), pursuant to Section 1.415 of the Commission's Rules, submits the following comments in response to the Notice of Proposed Rulemaking ("NPRM") in the above captioned proceeding released by the Federal Communications Commission ("FCC" or "Commission") on April 25, 1995.[1] The key proposal of the NPRM is to permit all satellites licensed by the United States to provide both domestic and international communications services. This would increase the opportunities for U.S. domestic satellites ("domsats") to serve Mexico.

I. INTRODUCTION AND SUMMARY

Telecomm generally supports the goals outlined by the NPRM of opening domestic and international markets to increased competition in satellite services. The newly adopted Federal Law of Telecommunications in Mexico ("Telecommunications

---

[1] 47 C.F.R. § 1.415; Notice of Proposed Rulemaking, IB Docket No. 95-41, Amendment to the Commission's Regulatory Policies Governing Domestic Fixed Satellites and Separate International Satellite Systems ("NPRM"), April 25, 1995.

Law") advances the principles of competition, private investment and market liberalization, and seeks to develop a market for satellite services that is open to both Mexican and foreign competitors. A license for a non-Mexican satellite system to provide service in Mexico will be granted according to certain conditions, one of which is that the country in which the non-Mexican satellite is licensed provide Mexican satellites with reciprocal treatment. The Telecommunications Law requires that such reciprocity be agreed through bilateral or multi-lateral agreement. Telecomm believes that the Commission should therefore consider the issue of reciprocity as central to any determination ensuing from the NPRM.

Achievement of a healthy, competitive satellite market in the United States, Mexico and the rest of the Americas will depend on a number of practical considerations, including how reciprocity is defined and implemented by respective governments. A transition period is required to provide time to implement a fair and equitable competitive market. Telecomm believes that to meet requirements for foreign satellite entry into the Mexican market, negotiations should be initiated at the next Mexico-United States bilateral through a Work Program established to renegotiate existing FSS agreements and develop agreements for DBS and MSS satellite systems. Such agreements should take into account (1) equitable distribution of orbital and frequency resources, given new market and policy conditions; (2) market access conditions for both the U.S. and the Mexican markets; and (3) reciprocal treatment

involving permissible foreign investment in satellite systems and services. In addition, given the size, strength and location of the principal U.S. domestic satellite service providers who plan to become international carriers, the Commission should consider placing conditions on dominant satellite providers during an interim period to ensure that fair and truly competitive market conditions can develop.

II. STATEMENT OF INTEREST

Telecomm, a commercial corporation owned by the Mexican government created in 1989 by presidential decree, is the Mexican Signatory to INTELSAT and Inmarsat and the owner and operator of Mexico's two domestic satellite systems, Morelos and Solidaridad, which provide domestic satellite services in Mexico as well as capacity for regional use in Latin America. In addition to its satellite responsibilities, Telecomm operates a telegraphic services network and provides value added public telex, facsmile, telegram and money order services.

The NPRM proposes to allow all U.S.-licensed geostationary (GSO) fixed satellites (FSS) to serve both U.S.- domestic and -international markets on a co-primary basis.[2] It also seeks comment on whether this policy should be extended to all U.S.-licensed GSO Direct Broadcast Service (DBS) and Mobile Satellite Service (MSS) systems, and whether non-U.S. satellites, including INTELSAT and Inmarsat, should be

---

[2]NPRM, para.41

permitted to serve the U.S. domestic market.[3] The NPRM encourages full participation of domestic and international satellite providers and users.[4]

The proposed changes could have far-reaching implications for Mexico and for Telecomm by dramatically altering the rules for serving the United States, Mexican and Latin American markets. While Telecomm supports the NPRM's goal of increasing competition in satellite services and increasing the supply of available satellite capacity, we believe that revisions to existing regulatory policies should be carefully crafted to ensure fair and equitable competition and reciprocal market access in practice as well as in law. For this to be achieved, account must be taken of the current condition of the various markets which will be affected and discussions must be held among all partners in the region to reach mutually beneficial arrangements.

III. BACKGROUND

A. Mexico is pursuing similar competitive goals and principles to those advanced by this NPRM.

The recent passage of major new telecommunications legislation, the Mexican Federal Law of Telecommunications Law ("Telecommunications Law"), has made this an historic year in Mexico's continuing effort to liberalize and open its telecommunications market and create competition. The new legislation will have particularly strong effects in the Mexican satellite services market. This new legislation

---

[3]NPRM, paras. 38-40.

[4]NPRM, para. 41.

shares the same fundamental principles and goals as the FCC's NPRM: its primary intention is to benefit consumers and industry by creating an environment in which competition, private investment and advanced technologies and services can flourish. Under the new law, concessions (licenses) are needed only to (1) use frequencies and orbital positions registered to Mexico; (2) install and operate a public telecommunications network; or (3) to commercialize the signals from a non-Mexican space station in Mexican territory. Up to 49% non-Mexican ownership is permitted in ownership of concessions.

Entities need only obtain authorization to install and operate an earth station with transmit capability; authorization is not required for receive-only earth stations. Obtaining such authorizations is largely an issue of demonstrating technical compliance.

Any non-Mexican satellite operator that wishes to serve the Mexican market may be authorized to do so if and when Mexican satellites are allowed, by inter-governmental agreement, to serve their market on a reciprocal basis. The new law requires that such reciprocity be agreed prior to granting access to the Mexican market. This policy applies to all segments of the satellite market, including the FSS, DBS and MSS markets. Under these provisions, it will be necessary for the United States to agree to allow Mexican satellites to provide FSS, DBS and MSS services in the United States in order for Mexico to be able to permit FCC-authorized satellites -- including Hughes' FSS satellite designed for DTH, the Low Earth Orbit Satellite (LEOS) systems, and AMSC's

geostationary L-band satellite -- to serve Mexico.

B. Mexico has planned its satellite facilities and its use of satellite systems based on international agreements and commitments

1. Mexico's use of satellite facilities owned by international organizations and by non-Mexican entities has been in accordance with policies developed through multilateral and bilateral agreements

a. Mexico has been an active participant in international satellite organizations. Mexico has been a major user of INTELSAT since it became a member in 1967. It has been a user of Inmarsat since 1989 and became a member in 1994. In addition to its continuing use of INTELSAT capacity for international services, Mexico leased INTELSAT capacity for domestic use prior to the launch of the Morelos system.

b. Mexico has cooperated with the United States in the authorization of transborder services. In 1985, the Mexican government authorized U.S. domestic satellites to extend their provision of incidental voice and video, business telecommunications and video programming distribution services across the Mexico-United States border to the extent that their footprints allowed. Mexico and the United States have thus far coordinated more than 35 satellites to provide transborder services not interconnected with the public switched network (PSN).

c. Mexico has cooperated in the authorization of U.S. separate satellite systems. In 1993 Mexico authorized two U.S. separate international satellite systems -- PanAmSat and Orion -- to provide international telecommunications services consistent

with the INTELSAT Article XIV(d) restriction on the provision of interconnected switched voice circuits. They do not provide domestic services in Mexico.

2. Mexican owned satellite facilities have been designed to conform to international commitments, domestic laws and an assessment of the markets affected by those commitments and laws.

a. The Solidaridad and Morelos systems are designed primarily for the Mexican domestic market. For the past decade, Mexico has been working to establish its own national satellite capability. In 1985, Mexico launched the Morelos satellite system to serve Mexico's domestic communications requirements. By 1994, Telecomm found it necessary to launch a second system -- the Solidaridad -- to meet current and projected demand for domestic satellite services in Mexico. Consistent with the United States-Mexico agreement regarding the provision of transborder services, the Solidaridad system was designed with the primary purpose of serving Mexico's C-, Ku- and L- band (FSS and MSS) domestic communications needs. Sixty-six transponders -- or 61% of the capacity on the Solidaridad and Morelos -- are in use today for domestic service. More that eighty-five percent of the capacity of the three Mexican satellites is designed to provide domestic service and the remaining fifteen percent is available for regional service in Latin America. The antenna patterns of the Mexican satellites provide only incidental coverage of the southern United States with some very limited Ku band coverage for transborder extension of intracorporate private networks. This coverage pattern reflects the commitment made regarding our neighbors' markets.

b. In addition to its commitments regarding transborder service and international satellites, the design of Mexico's satellite system is constrained by spectrum limitations and by its trilateral agreement with Canada and the United States on use of the geostationary arc for service to the Americas. In May 1988, when it became clear that this arc was becoming saturated, the United States, Mexico and Canada signed a trilateral agreement designed to accommodate the future domestic orbital requirements, as projectable at that time, of the three countries in the 3700-4200 MHZ, 5925-6425 MHZ, 11.7-12.2 GHz, and 14.0-14.5 GHz bands.[5] Specifically, the arrangement reserved a total of four slots for Canadian use and three for Mexican use in the arc between 107.3° WL to 118.7° WL. U.S. assignments begin at 105° WL in the eastern portion of the arc and at 121° WL in the West[6]. A transition period was established through 1995. Mexico, which had two satellites operational at that time, got one additional orbital slot as a result of the agreement.

Mexico agreed to this division of resources based on traffic projections that did not foresee the dramatic change in the market which is now underway and on the understanding that under its agreement with Canada and the United States the slots would be used primarily to accommodate domestic requirements, with transborder use authorized on an "incidental-only" basis. Yet due to their geographical advantage and

---

[5] This agreement updated a Trilateral Agreement negotiated in 1982.

[6]Mexico has coordinated a fourth orbital postion outside of this central orbital arc.

their apparent anticipation of a change in these ground rules, U.S. satellite operators have slowly, but steadily, expanded their "domestic" footprints to reach far enough North and South to provide at least voice grade services to the major population centers in Canada and Mexico. Telecomm estimates that the beam coverages of more than 250 transponders on existing operational U.S. domestic satellites include most of Mexico and the beam coverages of more than 350 U.S. domestic satellite transponders include the populated areas of Canada. U.S.-owned capacity available to serve the Canadian and Mexican markets is likely to increase significantly as U.S. operators replace and augment their existing satellites with ones that have more powerful and far-reaching signals.

C. The agreements between the United States and Mexico related to satellite communications no longer reflect changing market and legal developments.

1. There has been a dramatic growth in demand for telecommunications services in Mexico and Latin America and in the number of existing and potential suppliers of those services.

Domestic consumer and economic concerns as well as Mexico's participation in the NAFTA, GATT and other such trade accords have spurred demand for telecommunications services, particularly within the Americas. Mexico now sends nearly 90% of its international calls to the U.S. and this flow of traffic continues to grow at an increasing rate. The growing Hispanic population in the United States is fueling demand for Spanish-language video and audio programming. And while a great many U.S. companies seek to capture a share of Mexico's growing market, Mexican companies consider access to the huge U.S. market to be an essential component of their

international growth strategies.

Similar growth in demand for advanced telecommunications services and infrastructure can be seen throughout Latin America. Governments and telecommunications providers in countries in our region have been forging ahead with efforts to liberalize, privatize, and put in place the infrastructure needed to meet these needs as quickly as possible.

2. Congested spectrum and saturation of the Americas' orbital arc limit Latin American companies' ability to serve their own countries and region.

Latin American countries often prefer to develop their own national or regional capability to serve the requirements of their own citizens. However, the orbital resources required to accomplish this goal have become so scarce that the newer Latin American players often find themselves limited in their ability to achieve this goal. For example, the Andean countries have experienced difficulties in obtaining orbital positions to implement their proposed regional "Simon Bolivar" system. U.S. satellites currently occupy nearly all of the prime orbital positions that are useful for covering the Americas. In fact, the imbalance is quite staggering: the United States now has 35 slots, while Canada has four, Mexico has four, Brazil has three and Argentina has two in the Americas arc. The U.S. domestic satellite market is now relatively mature and saturated and its established operators are understandably seeking new opportunities with their huge satellite capacity magnified by new technologies. If the current allocation of

resources is not moderated, only U.S. companies will have sufficient access to orbital resources and spectrum to serve the growth traffic in the Americas.

IV. DISCUSSION

A. Telecomm supports a more competitive satellite communications market

The introduction to the NPRM indicates that the purpose of the FCC's proposal to treat all U.S.-licensed geostationary fixed satellites under a single regulatory scheme is:

> ... to increase competition in fixed satellite services by increasing the amount of satellite capacity available for both domestic and international use, and to eliminate regulations that impair businesses' ability to meet their customers' needs.[7]

Other anticipated benefits are stated to be: 1) permitting operators "to use their satellites more efficiently and to provide innovative and customer tailored services"; 2) benefitting consumers by "increasing service options, lowering prices, and facilitating the creation of a global infrastructure"; and 3) helping to "avoid shortages of space segment capacity in the event of a launch failure of other catastrophic event."[8]

Telecomm supports these general principles of competition, which are consistent with the steps currently being taken in Mexico under its new Telecommunications Law. However, we believe that the intended benefits of competition cannot be achieved unless

---

[7]NPRM, para. 1.

[8]NPRM, para. 21.

steps are taken to ensure that competition is fair and equitable and access to markets is permitted on a reciprocal basis. Unless such steps are taken, the proposed change could have the unintended consequence of reducing competition by further concentrating satellite resources into the control of a small number of suppliers.

B. Although the proposed rules are intended to eliminate discrimination and permit equitable competition, in practice they could be disruptive to the goal of achieving full and broad competition in light of the existing state of the market.

The Commission recognizes that implementation of their proposed policy to permit domestic satellite licensees to provide international services is "subject to the approval of the affected foreign country".[9] This approval is more likely to be forthcoming and the policy is likely to be more successful in achieving its goals if the policy adopted by the Commission considers and mitigates the potential impact of the proposed changes on the market and the existing and potential service providers in the affected countries. The Commission's policy needs to be fair and equitable, not just in theory but also in practice.

1. The imbalance in available orbital resources distorts the suppliers market.

There is already a dramatic imbalance in use of orbital resources serving the Americas. U.S. domestic satellites currently occupy 35 orbital positions and ownership of those satellites is concentrated in two large corporations: Hughes with 14 satellites

---

[9]NPRM, para. 18.

(with which they have already proposed to serve Latin America and the Caribbean as well as the United States) and GE with 15 satellites. Mexico currently has four orbital positions and Canada occupies four. This distribution of positions may have been reasonable in light of the size of the domestic market in each of the countries at the time of the U.S./Canada/Mexico trilateral agreement and under a policy in which only incidental traffic from one country could be carried on the satellite system of another. However, under current market conditions, made more dramatic by the revised rules proposed by the NPRM, the imbalance is clearly inequitable. We are pleased to see that the Commission acknowledges that this may be an issue and has requested comment on "considerations as to how the proposed changes will affect orbital assignments" and "the need to reopen coordination with satellite systems from other countries."[10] In our view, significant changes in the current transborder and separate systems policies will increase the already urgent need for reconsideration of existing agreements on the orbital arc and spectrum use in the Americas.

2. Under the current distribution of domestic satellite capacity, the impact of an open access policy on market is likely to be far greater in Canada and Mexico than in the U.S.

a. U.S. domestic satellites have the ability to expand rapidly into the Canadian and Mexican markets and the potential to compete unfairly. The operational costs of U.S. domestic satellites are already covered through provision of

---

[10]NPRM, para.40.

U.S. domestic services and they are commercially viable without additional markets. Further, U.S. domestic satellite market power is concentrated with two large operators controlling 29 of the 35 U.S. slots. This scale of operation, with the U.S. market as "home base," particularly positions these two operators to market their services below cost in Mexico and Canada. Such as possibility is exacerbated by the technological capacity multipliers, such as higher power and digital compression that will give these already very large providers enormous amounts of capacity to fill. The current coverage of in-orbit U.S. domestic satellites already includes much of the populated areas of Mexico and Canada and the domestic satellite owners have been planning for years to expand into markets currently closed to them. These systems could provide service to a significant portion of Mexico today and could expand their coverage and activities rapidly.

b. Mexican domestic satellites can not yet compete effectively in the U.S. market. We note that the NPRM does not propose a reciprocal opening of the U.S. market to non-U.S. licensed satellites but invites comment on this issue.[11] Telecomm believes that reciprocity in this matter is a minimum requirement in light of the reciprocity requirements of Mexican telecommunications law but emphasizes that reciprocity alone is not sufficient to deal with current inequities. We hope and expect that, under the right conditions, Mexican and U.S. satellite systems can compete

---

[11]NPRM, para. 39.

effectively in each others' markets, but we are not yet at that stage of development. Even if Mexican domestic satellites were authorized to provide services to the United States on the same terms as U.S.-licensed satellites, they would have little ability to affect that market. Mexico's new Solidaridad satellites have a limited amount of capacity, coverage and authority for regional/international use. Further, Mexico has so few satellites and such incomplete coverage of the United States, as well as such a small traffic base, that their entry into the U.S. market would not allow them to compensate sufficiently for loss of Mexican traffic to U.S. satellites by acquiring significant U.S. traffic. Telecomm respectfully asks the FCC to factor these issues into their final proposals in order to avoid the creation of a less competitive international market. If the goals of competition are to be achieved, steps must be taken to ensure that no company exercises undue market influence or predatory behavior.

C. As a practical matter, fair and equitable competition and reciprocal access cannot be accomplished overnight --- a transition period is needed.

The policy should be implemented in a way to ensure the maximum number of service providers can flourish in a truly competitive environment. Telecomm predicts that the telecommunications market in Mexico and all of the Americas will be big enough to support multiple service providers and believes that the participation of U.S. satellite operators will ultimately fuel this growth. However, there are some practical considerations that need to be addressed first in order for that in fact to happen.

1. The FCC should place conditions on dominant carriers during a transition phase.

The United States has recognized the need to place limits on competitors with significant market power during a transition period in order to permit newer competitors to build market share. The clearest recent example of this type of policy in telecommunications matters was the classification of AT&T as dominant carrier in the U.S. long distance market and the resulting operating restrictions. Similar steps were taken when the United States implemented its domestic "Open Skies" policy in 1972; AT&T was not permitted to enter the U.S. domestic satellite market for a three year period to give other satellite systems an opportunity to become established.

2. A transition phase provides time for the U.S. and Mexico to negotiate or renegotiate relevant agreements.

The new Telecommunications Law requires that access to the Mexican market be granted only on a reciprocal basis authorized by agreement. Time will be required to renegotiate existing treaties and negotiate new treaties that permit the provision of transborder and international FSS, DBS and MSS services on a reciprocal basis. Telecomm is anxious to move forward in finding ways to achieve mutual reciprocal market access and believes that a transition period in which markets are opened gradually may be the most reasonable, practical approach. Telecomm suggests that the U.S. and Mexico use the next U.S.-Mexican bilateral as an opportunity to negotiate the length and

terms of a transition period which would permit equitable treatment of all service providers and maximum benefit for users.

During the agreed transition period, discussions and negotiations should be held on a number of issues. Since the net effect on the Mexican market will be the same as a result of expanding service into Mexico by U.S.-licensed domestic and international satellite service providers, we would see the negotiations being conducted on the basis of the kinds of service and bands and orbital positions in use rather than on the geographic scope of the initial U.S. license. Telecomm sees those negotiations as covering four basic areas:

a. **The United States and Mexico must reassess the distribution of orbital frequency resources in light of market conditions and policy changes.**

b. **The United States and Mexico should expand the existing bilateral agreement on transborder FSS satellite communications to cover the open market access contemplated by the NPRM on a reciprocal basis.**

c. **The United States and Mexico must reach agreement on reciprocal treatment of DBS broadcasting services and for both LEO and GEO MSS services.**

The Commission has requested comments on the extension of its proposed regulatory scheme for FSS satellites to all U.S. licensed satellites.[12] In this regard we note in particular the difficulties which may arise in these discussions in light of the limited spectrum available for MSS services and the complications related to expansion of DBS services covered by the ITU plan. Further, we believe that expansion of the service area of the AMSC satellite to include the Mexican market would not be consistent with Mexican legislation if AMSC retains a monopoly in the U.S. domestic market.

d. The United States and Mexico must discuss reciprocal treatment of participation of foreign investment in satellite systems.

Assurances would be needed that all Mexican satellite companies, including Telecomm, shall be accorded the same treatment in the U.S. as U.S. companies would have in Mexico

V. CONCLUSION

Telecomm supports the principles of competition. Mexico is already moving in that direction. However, in developing its new satellite policies, the FCC must consider in practical terms what is required to reach equilibrium in a competitive market and the U.S. needs to work with its partners in the region to permit competition which is truly fair, equitable and reciprocal.

---

[12]NPRM, para. 38.

Respectfully submitted

TELECOMUNICACIONES DE MEXICO

By _____

Carlos Mier y Teran Ordiales

Director General

Eje Central Lazaro Cardenas 567

Col. Narvarte, México, D.F. C.P. 03020

(525) 629-11-70 (telephone)

(525) 709-96-38 (fax)

1200 19th St., NW.

Suite 607

Washington, D.C. 20036

(202)-466-3055 (fax)

(202)-833-2390 (telephone)

Attention: CRI

Certificate of Service

I, Kaye R. Nilson, hereby certify that the foregoing Comments were served by first-class mail, postage prepaid, this 8th day of June, 1995, on the following persons:

Chairman Reed E. Hundt*
Federal Communications Commission
Room 814
1919 M Street, NW
Washington, DC 20554

Commissioner James H. Quello*
Federal Communications Commission
Room 802
1919 M Street, NW
Washington, DC 20554

Commissioner Andrew C. Barrett*
Federal Communications Commission
Room 826
1919 M Street, NW
Washington, DC 20554

Commissioner Rachelle B. Chong*
Federal Communications Commission
Room 844
1919 M Street, NW
Washington, DC 20554

Commissioner Susan Ness*
Federal Communications Commission
Room 832
1919 M Street, NW
Washington, DC 20554

Scott Blake Harris*
Chief
International Bureau
Federal Communications Commission
Room 800, Stop Code 0800
2000 M Street, NW
Washington, DC 20554

* Via Hand Delivery

Richard Smith
Chief, Office of Engineering & Technology
Room 480
2000 M Street, NW
Washington, DC 20554

Roderick K. Porter
Deputy Chief
International Bureau
Federal Communications Commission
Room 800, Stop Code 0800
2000 M Street, NW
Washington, DC 20554

Wendell Harris
Associate Bureau Chief, Negotiations/Planning
International Bureau
Federal Communications Commission
Room 800, Stop Code 0800
2000 M Street, NW
Washington, DC 20554

James Ball*
Associate Bureau Chief, Policy
International Bureau
Federal Communications Commission
Room 800, Stop Code 0800
2000 M Street, NW
Washington, DC 20554

Mark Grannis
International Bureau
Federal Communications Commission
Room 800, Stop Code 0800
2000 M Street, NW
Washington, DC 20554

* Via Hand Delivery

Thomas S. Tycz*
Chief, Satellite and Radiocommunications Division
International Bureau
Federal Communications Commission
Room 800, Stop Code 0800B
2000 M Street, NW
Washington, DC 20554

Aileen Pisciotta
Chief, Planning & Negotiations Division
International Bureau
Federal Communications Commission
Room 800, Stop Code 0800C
2000 M Street, NW
Washington, DC 20554

Cecily C. Holiday
Deputy Chief, Satellite and Radiocommunications Division
International Bureau
Federal Communications Commission
Room 800, Stop Code 0800B
2000 M Street, NW
Washington, DC 20554

Fern J. Jarmulnek
Chief, Satellite Radio Branch
International Bureau
Federal Communications Commission
Room 800, Stop Code 0800B
2000 M Street, NW
Washington, DC 20554

Joslyn Reed*
Chief, Bilateral Negotiations
Planning & Negotiations Division
International Bureau
Federal Communications Commission
Room 800, Stop Code 0800C
2000 M Street, NW
Washington, DC 20554

Kaye R. Nilson

* Via Hand Delivery